

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

12.6413

MELBA DENISE PHIPPS,

PLAINTIFF,

VS.

NO._____

**MATTHEW BRADY WATSON AND
J.B. HUNT TRANSPORT, INC.,**

DEFENDANTS.

NOTICE OF REMOVAL

Defendant, J.B. Hunt Transport, Inc., files this Notice of Removal in the above-referenced Matter. This case stems from a motor vehicle incident which occurred in Shelby County, Tennessee. Defendant would show to the Court that there is complete diversity of citizenship, as Plaintiff and Defendant from different states, and the amount in controversy exceeds \$75,000, exclusive of interest and costs. As of the time of this filing, Defendant J.B. Hunt Transport, Inc., is the only named Defendant which Plaintiff has properly served with a summons and a copy of the Complaint. Therefore, removal is proper from the Shelby County Circuit Court to the United States District Court for the Western District of Tennessee.

Attached and marked as Exhibits "A" and "B" are copies of the Pleadings that have been filed. Defendant has attached an affidavit from Erin Campbell, the Litigation Examiner for Defendant, as Exhibit "C." Campbell's affidavit establishes Defendant's

residence for diversity purposes, as paragraph 3 of Plaintiff's Complaint incorrect. Defendant has also attached the "Business Records Inquiry" for J.B. Hunt Transport, Inc., which is available through the Tennessee Secretary of State's website. The "Business Records Inquiry" is attached to this Notice as Exhibit "D."

Respectfully submitted,

**McNABB, BRAGORGOS,
BURGESS & SORIN, PLLC**

s/ Leland M. McNabb

LELAND MCNABB #07551
BEN H. ARNOLD #35440
Attorneys for J.B. Hunt Transport, Inc.
81 Monroe, Sixth Floor
Memphis, Tennessee 38103
Telephone: (901) 624-0640
Fax: (901) 624-0650
lmcnabb@mbbslaw.com
barnold@mbbslaw.com

CERTIFICATE OF SERVICE

This certifies that a copy of the foregoing has been served upon opposing counsel for all parties or all parties individually as follows,

Daryl A. Gray Esq.
Gray Law Group, LLC
1331 Union Avenue
Memphis, TN 38104

by placing a copy of same in the U.S. Mail, postage prepaid, on the 2nd day of November, 2017.

s/ Leland M. McNabb

LELAND M. MCNABB